



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

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OFFICE OF
AIR, WASTE AND
TOXICS

DEC 20 2012

Stuart Clark
Air Quality Program Manager
Washington Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Dear Mr. Clark: *Stu*

Pending approval of the state Prevention of Significant Deterioration (PSD) program, the Department of Ecology and Region 10 have an obligation to ensure that the federal PSD requirements are applied at the Simpson Tacoma Kraft 9stk) facility in a manner consistent with the federal PSD program as it is implemented nationally by EPA. You have submitted to us a draft PSD permit revision to relax the nitrogen oxide emissions limits on Boiler #7 at the STK facility. For EPA to determine if this proposed action is consistent with the federal PSD program's requirements for permit revisions, we need the following information from you or STK:

1. A detailed accounting of the sources, specific and relative quantities, types, and characteristics (e.g., chloride content) of all the fuels and materials burned in Boiler #7 during the 2004 -2005 time period which formed the basis for the PSD permit limits, and since the PSD permit was issued in 2007. This accounting must include more than a general description of the fuels and materials that have been or may be used as feedstock, and should delineate the suppliers, composition, quantities and combination of the different materials and fuels that have been or are being burned. All descriptions need to be referenced to the original source documentation and copies of the referenced documentation provided.
2. A detailed description of any physical changes to Power Boiler #7 since the 2007 PSD permit was issued. Any description need to be referenced to the original source documentation and copies of the referenced documentation provided (e.g. construction plans and specifications).

This same information will need to be in your administrative record for any permit revision.

Once EPA obtains this information, we will be able to make an assessment of whether the State's approach to revise the existing PSD permit is consistent with federal law. Upon EPA's decision on the permit revision, we can discuss the path forward. Thanks for your help with this.

Sincerely,

A handwritten signature in black ink, appearing to read "K. Kelly".

Kate Kelly, Director
Office of Air, Waste, and Toxics